

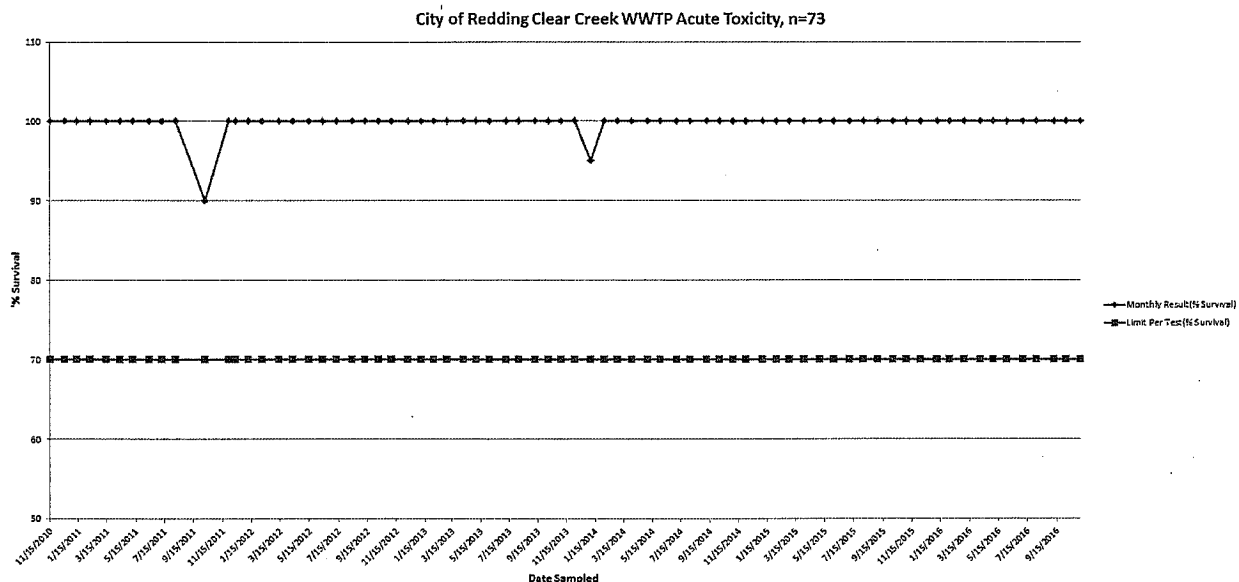
Daniel Webster
889 Partridge Drive
Redding, CA 96003

RECEIVED
SACRAMENTO
CVR WQCB

17 JAN 20 10 10:41

Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite #200
Rancho Cordova, CA 95670-6114
January 19th, 2017

I would like to comment on an item that appears on page E-6 of the preliminary permit R5-2017-XXX for the City of Redding Clear Creek Wastewater Treatment Plant NPDES permit. It is stated that a monthly sampling requirement of the effluent will be retained for acute toxicity. Searching through other northern California permits it appears that quarterly sampling is the norm; the most stringent permit I found required every other month sampling. I can understand how the rationale for requiring permit R5-2010-0096 to specify monthly sampling would have been to establish a baseline because it was a fresh requirement, but when the data points from CIQWIS are plotted it would seem that the either the test is not very stringent or the quality of the effluent is such that a passing result will always be granted:



Another possibility is that the sampling was not extensive enough considering that grab samples were required:

Sampling frequency scenario	Test points	Sampling time of flow represented by single grab sample(5 gallon sample), minutes	Sampling time of flow represented by 24-hour composite sample, minutes	Total Time of flow represented by samples(hours)	Total Time of flow represented by samples(days)	
Monthly, Permit #R5-2010-0096	73	~7		8.52	0.35	<-2010-2016
Monthly, Permit #R5-2017-XXX	73		1440	1752	73	<-Proposed permit
Quarterly, Common NPDES requirement	18.25		1440	438	18.25	<-Suggested change to permit

This permit transitions from a mere 0.35 days of the effluent flow represented by the grab technique over the course of the permit to 73 days over the course of the same number of years through the

composite sampling technique. If the sampling frequency were to be throttled back to quarterly from monthly, a huge increase is still experienced in sampling size(18 days) without pouring excessive resources into a test that may have minimal benefit. The more stringent chronic toxicity test is resource-draining enough but I believe better accomplishes the goal of evaluating the effect of the effluent on the Sacramento River. That test's frequency of twice a year I believe to be appropriate even if one of the organisms(Ceriodaphnia dubia) is so sensitive that phthalates that may be present in sampling containers can affect it's reproductive ability.

Please consider reducing the acute toxicity sampling frequency to quarterly to maximize the benefit of the effluent analysis requirements.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Webster". The signature is written in a cursive, flowing style with some loops and flourishes.

Daniel Webster